

1 PHILIP A. SEGAL 137633  
2 TIFFANY DAY, ESQ. 273005  
3 **KERN, NODA, DEVINE & SEGAL**  
4 1388 Sutter Street, Suite 600  
5 San Francisco, CA 94109  
6 Tel: (415) 474-1900  
7 Fax: (415) 474-0302

8 Attorneys for Plaintiff  
9 **ABDUL GHAFOOR**

10 KEVIN R. SUTHERLAND, ESQ. 163746  
11 KEVIN O. MOON, ESQ. 246792  
12 **CLYDE & CO US LLP**  
13 101 Second Street, 24<sup>th</sup> Floor  
14 San Francisco, CA 94105  
15 Tel: (415) 365-9800  
16 Fax: (415) 365-9801

17 Attorneys for Defendant  
18 **EMIRATES**

19 IN THE UNITED STATES DISTRICT COURT  
20 FOR THE NORTHERN DISTRICT OF CALIFORNIA

21 ABDUL GHAFOOR,

22 NO.: 3:15-cv-00022-JST

23 Plaintiff,

24 vs.  
25 **JOINT STIPULATION AND [PROPOSED]**  
26 **ORDER REGARDING BRIEFING ON**  
27 **MOTION FOR JUDGMENT ON THE**  
28 **PLEADINGS**

---

EMIRATES AIRLINE,

Defendant.

Date: September 3, 2015

Time: 2:00 p.m.

Courtroom 9, 19<sup>th</sup> Floor

Hon. Jon S. Tigar

---

Pursuant to Local Rule 7-12, Plaintiff Abdul Ghafoor (“Plaintiff”) and Defendant Emirates (“Defendant,” and collectively with Ghafoor, the “Parties”), stipulate as recited below:

WHEREAS, on July 20, 2015, Defendant filed a motion for judgment on the pleadings (Dkt. No. 23);

WHEREAS, pursuant to Local Rule 7-3, Plaintiff’s opposition must be filed and served not more than 14 days after the motion was filed, and as such Plaintiff’s opposition is due August 3, 2015;

WHEREAS, pursuant to Local Rule 7-3, Defendant’s reply to any opposition must be filed and served not more than 7 days after the opposition was due, and as such Defendant’s reply is due August 10, 2015;

WHEREAS, on July 30, 2015, Plaintiff’s counsel contacted Defendant’s counsel regarding settlement negotiations and to make a settlement demand on behalf of Plaintiff;

WHEREAS, on July 31, 2015, Defendant’s counsel informed Plaintiff’s counsel that, due to the time difference, representatives for Defendant, who are located in Dubai, likely will be unable to respond to Plaintiff’s settlement demand until at least August 3, 2015;

WHEREAS, the Parties agree that good cause exists for the Court to extend the date of Defendant’s opposition and Plaintiff’s reply by one week each to allow for ongoing settlement discussions and possible resolution of the case, such that Defendant’s opposition would be due on August 10, 2015 and Plaintiff’s reply would be due on August 17, 2015;

WHEREAS, this is the first request to modify the briefing schedule for the motion for judgment on the pleadings;

WHEREAS, the Parties do not anticipate that granting this stipulation will have any effect on any other deadlines in this case;

THE PARTIES HEREBY STIPULATE and jointly request, subject to Court approval, as follows (and as reflected in the table below):

**STIPULATION AND [PROPOSED] ORDER RE BRIEFING SCHEDULE ON MOTION FOR JUDGMENT ON  
THE PLEADINGS**

- (1) Plaintiff's opposition to Defendant's motion for judgment on the pleadings shall be due August 10, 2015;
- (2) Defendant's reply to Plaintiff's opposition shall be due on August 17, 2015;
- (3) The hearing on the motion for judgment on the pleadings currently scheduled for September 3, 2015 shall remain unchanged.

Event	Date
Deadline for Plaintiff to file opposition to Defendant's motion for judgment on the pleadings	August 10, 2015
Deadline for Defendant to file reply to Plaintiff's opposition	August 17, 2015
Hearing on motion on judgment on the pleadings	September 3, 2015

DATED: July 31, 2015

KERN, NODA, DEVINE & SEGAL

By: /s/ Tiffany Day  
TIFFANY DAY  
Attorney for Plaintiff,  
ABDUL GHAFQOR

DATED: July 31, 2015

CLYDE & CO US LLP

By: /s/ Kevin Moon  
KEVIN MOON  
Attorney for Defendant,  
EMIRATES

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The Honorable Jon S. Tigar  
United States District Judge

Dated: July 31, 2015